

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY (CAMDEN)	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kevin Buttery, Esq. (KB-3800)	Bankruptcy Petition No. 18-21885-ABA CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Deborah Ross, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

DITECH FINANCIAL LLC ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 15), and states as follows:

1. Debtor, Deborah Ross ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 12, 2018.
2. Secured Creditor holds a security interest in the Debtor's real property located at 179 ERNEST GARTON RD, ALLOWAY, NJ 08001, by virtue of a Mortgage recorded on April 29, 2008 in Book 02375, at Page 00031 of the Public Records of Salem County, NJ. Said Mortgage secures a Note in the amount of \$255,000.00.
3. The Debtor filed a Chapter 13 Plan on June 26, 2018.
4. The Plan fails to include treatment of Secured Creditor's claim. The subject property and claim are, however, listed in Debtor's schedules. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the subject property and claim.
5. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections

stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Kevin Buttery
Kevin Buttery, Esquire
NJ Bar Number KB-3800
Email: kbuttery@rascrane.com

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CERTIFICATION OF SERVICE

1. I, Kevin Buttery, represent DITECH FINANCIAL LLC in this matter.
2. On 8/1/2018, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

8/1/2018

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Kevin Buttery
Kevin Buttery, Esquire
NJ Bar Number KB-3800
Email: kbuttery@rascrane.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Deborah Ross, PRO SE PO Box 847 Alloway, NJ 08001	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002 (856) 663-5002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee Dept of Justice Office of the U.S. Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)